

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

NATHAN ROBERTS, et al.	)	Case No. 1:23-CV-1597
	)	
Plaintiff,	)	JUDGE PATRICIA A. GAUGHAN
	)	
vs.	)	Magistrate Judge James E. Grimes, Jr.
	)	
PROGRESSIVE PREFERRED	)	
INSURANCE COMPANY, et al.	)	
	)	
Defendants	)	

**MOTION OF DEFENDANT CIRCULAR BOARD INC. FOR ADMISSION  
PRO HAC VICE OF NEAL KATYAL**

Pursuant to Rule 83.5(h) of the Local Civil Rules of the United States District Court for the Northern District of Ohio, Defendant Circular Board Inc.,<sup>1</sup> by and through undersigned counsel, hereby moves this Court for an Order permitting Neal Katyal to appear and participate in this case *pro hac vice* as co-counsel of record for Defendant Circular Board Inc. In support of this Motion for *pro hac vice* admission to the bar of this Court, the undersigned states the following:

1. Mr. Katyal's Declaration in support of this Motion is attached hereto as Exhibit "A" and incorporated by reference herein.
2. Mr. Katyal is a Partner with the law firm of Hogan Lovells US LLP in its Washington, D.C. office.

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<sup>1</sup> Plaintiff's Complaint incorrectly names Defendant Circular Board Inc. as Circular Board LLC.

3. Mr. Katyal represents that the following is a list of jurisdictions in which he is licensed to practice law, including dates of admission to practice, and any attorney registration numbers:

- District of Columbia: Admitted January 11, 1999, Bar No. 462071. A true copy of the Certificate of Good Standing from the District of Columbia Bar is attached hereto as Exhibit "B" and incorporated by reference herein.
- U.S. Supreme Court, Admitted December 16, 2002.
- U.S. Court of Appeals for the First Circuit, Admitted April 21, 2016, Bar No. 1174716.
- U.S. Court of Appeals for the Second Circuit, Admitted July 7, 2008, Bar No. 08-193075.
- U.S. Court of Appeals for the Third Circuit, Admitted February 16, 2018.
- U.S. Court of Appeals for the Fourth Circuit, Admitted March 14, 2011.
- U.S. Court of Appeals for the Fifth Circuit, Admitted May 1, 2015.
- U.S. Court of Appeals for the Sixth Circuit, Admitted July 3, 2001.
- U.S. Court of Appeals for the Seventh Circuit, Admitted October 4, 2011.
- U.S. Court of Appeals for the Eighth Circuit, Admitted July 3, 2012.
- U.S. Court of Appeals for the Ninth Circuit, Admitted October 17, 2012.
- U.S. Court of Appeals for the Tenth Circuit, Admitted June 15, 2012.
- U.S. Court of Appeals for the Eleventh Circuit, Admitted March 28, 2018.
- U.S. Court of Appeals for the Federal Circuit, Admitted October 11, 2012.
- U.S. Court of Appeals for the D.C. Circuit, Admitted February 23, 1999, Bar No. 46044.
- State of Maryland, Admitted June 10, 2016, Bar No. 1606100002.

- U.S. District Court for the District of Columbia and Bankruptcy Courts, Admitted May 9, 1971, Bar No. 462071.
- U.S. District Court for the District of Maryland, Admitted February 26, 2021, Bar No. 21694.
- U.S. Court of International Trade, Admitted March 14, 2018.

4. Mr. Katyal's office address, telephone number, facsimile number and email address are as follows:

Neal Katyal  
HOGAN LOVELLS US LLP  
555 13<sup>th</sup> Street, NW  
Washington, D.C. 20004  
Telephone: (202) 637-5528  
Facsimile: (202) 637-5910  
neal.katyal@hoganlovells.com

5. Mr. Katyal states he has never been disbarred or suspended from the practice of law before any court, department, bureau or commission of any State or the United States, nor has he ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.

6. Mr. Katyal understands that admission *pro hac vice* before this Court subjects him to the disciplinary jurisdiction of this Court. He agrees to adhere to and be bound by all local rules of the Court.

7. Defendant Circular Board Inc. is also being represented in this action by the undersigned counsel who are licensed to practice law in Ohio and in the Northern District of Ohio.

8. The \$120.00 admission fee is being paid simultaneously with the submission of this Motion.

For the foregoing reasons, Defendant Circular Board Inc. respectfully requests this Court grant its Motion for Admission *Pro Hac Vice* of Neal Katyal. A proposed Order is also attached hereto for the convenience of the Court.

Dated this 23rd day of October, 2023.

Respectfully submitted,

/s/ Dolores P. Garcia  
Michael N. Ungar (0016989)  
Dolores P. Garcia (0085644)  
Halden R. Schwallie (0093665)  
ULMER & BERNE LLP  
1660 West 2<sup>nd</sup> Street, Suite 1100  
Cleveland, OH 44113  
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Fax: (216) 583-7001  
mungar@ulmer.com  
dgarcia@ulmer.com  
hschwallie@ulmer.com

*Attorneys for Defendant Circular Board Inc.*

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed electronically this 23rd day of October, 2023. Notice of this filing will be sent to all parties by operation of the Court's Electronic filing system. Parties may access this filing through the Court's system.

*/s/ Dolores P. Garcia* \_\_\_\_\_  
Dolores P. Garcia

*One of the Attorneys for Defendant Circular  
Board Inc.*

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

NATHAN ROBERTS, et al.	)	Case No. 1:23-CV-1597
	)	
Plaintiff,	)	JUDGE PATRICIA A. GAUGHAN
	)	
vs.	)	Magistrate Judge James E. Grimes, Jr.
	)	
PROGRESSIVE PREFERRED	)	
INSURANCE COMPANY, et al.	)	
	)	
Defendants.	)	

DECLARATION OF NEAL KATYAL IN SUPPORT OF THE  
MOTION OF DEFENDANT CIRCULAR BOARD INC. FOR  
HIS ADMISSION PRO HAC VICE

I, Neal Katyal, hereby declare, depose, attest, state and aver as follows:

1. I respectfully wish to apply for permission to appear *pro hac vice* as co-counsel of record on behalf of Defendant Circular Board Inc. in the above captioned case.

2. I am admitted to practice and in good standing (i.e., currently authorized to practice as an attorney) in the following United States Court(s) and/or State's highest court(s):

- District of Columbia: Admitted January 11, 1999.
- U.S. Supreme Court, Admitted December 16, 2002.
- U.S. Court of Appeals for the First Circuit, Admitted April 21, 2016.
- U.S. Court of Appeals for the Second Circuit, Admitted July 7, 2008.
- U.S. Court of Appeals for the Third Circuit, Admitted February 16, 2018.
- U.S. Court of Appeals for the Fourth Circuit, Admitted March 14, 2011.
- U.S. Court of Appeals for the Fifth Circuit, Admitted May 1, 2015.
- U.S. Court of Appeals for the Sixth Circuit, Admitted July 3, 2001.

- U.S. Court of Appeals for the Seventh Circuit, Admitted October 4, 2011.
- U.S. Court of Appeals for the Eighth Circuit, Admitted July 3, 2012.
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- U.S. Court of Appeals for the D.C. Circuit, Admitted February 23, 1999.
- State of Maryland, Admitted June 10, 2016, Bar No. 1606100002.
- U.S. District Court for the District of Columbia and Bankruptcy Courts, Admitted May 9, 1971.
- U.S. District Court for the District of Maryland, Admitted February 26, 2021.
- U.S. Court of International Trade, Admitted March 14, 2018.

3. I have never been disbarred or suspended from the practice of law before any court, department, bureau or commission of any State or the United States, nor have I ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.

4. My contact information is:

Neal Katyal  
Hogan Lovells US LLP  
555 13<sup>th</sup> Street NW  
Washington, D.C. 20004  
Telephone: (202) 637-5528  
Facsimile: (202) 637-5910  
neal.katyal@hoganlovells.com

5. I will be associated with Michael N. Ungar, Dolores P. Garcia and Halden R. Schwallie, members in good standing of the bar of this Court, as counsel for Defendant Circular Board Inc.

6. By this appearance, I hereby affirm that all motions, pleadings and papers signed by me or on my behalf in this case shall constitute a certificate, whether or not such papers affirm or verify, that I have read the pleading, motion or paper, and to the best of my knowledge, information and belief there is good ground to support it and that it is not intended for purposes of delay.

7. I agree to be bound by all applicable rules of procedure, ethics and professional conduct in force in this jurisdiction, including without limitation the Local Rules of the Court.

8. The administrative fees required to process the Motion for Admission *pro hac vice* will be paid to the Clerk of this Court at the time of filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Washington, D.C., on this 19<sup>th</sup> day of October, 2023.

  
Neal Katyal

# **EXHIBIT B**



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that*

***Neal Katyal***

*was duly qualified and admitted on January 11, 1999 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.*

*IN TESTIMONY WHEREOF,  
I have hereunto subscribed my  
name and affixed the seal of this  
Court at the City of  
Washington, D.C., on September 28, 2023.*

*Julio A. Castillo*  
JULIO A. CASTILLO  
Clerk of the Court

*Issued By:*

A handwritten signature in black ink, appearing to read "David Chu".

*David Chu - Director, Membership  
District of Columbia Bar Membership*

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcbar.org.***